

REMARKS

Claims 1-36 are pending in the application.

Claims 1-36 have been rejected.

Rejection of Claims under 35 U.S.C. § 103

Claims 1-36 stand rejected under 35 U.S.C. §103(a) as purportedly being unpatentable over U.S. Patent No. 6,587,126 issued to Wakai et al. (“Wakai”), in view of U.S. Patent No. 6,421,733 issued to Tso et al. (“Tso”) and U.S. Patent No. 7,167,919 issued to Iwamoto et al (“Iwamoto”). Applicants respectfully traverse these rejections.

In order for a claim to be rendered invalid under 35 U.S.C. §103, the subject matter of the claim as a whole would have to be obvious to a person of ordinary skill in the art at the time the invention was made. *See* 35 U.S.C. §103(a). This requires: (1) the reference(s) must teach or suggest all of the claim limitations; (2) there must be some teaching, suggestion or motivation to combine references either in the references themselves or in the knowledge of the art; and (3) there must be a reasonable expectation of success. *See* MPEP 2143; MPEP 2143.03; *In re Rouffet*, 149 F.3d 1350, 1355-56 (Fed. Cir. 1998).

As an initial matter, Applicants incorporate previous discussion related to Wakai and Tso to the extent that it continues to apply to claim limitations present in the amended claims. In addition, Applicants present the following discussion.

Independent Claims 1, 9, 16, 23 and 30:

Independent Claims 1, 9, 16, 23 and 30 each contain, among others, substantially the following claim limitations:

receiving a request to provide a requested service, wherein
the request conforms to a request format defined in a first language,
a module performing said receiving is configured to receive the request from a plurality
of source types, and
the plurality of source types comprises an applet executing on a first remote network
node, a control module executing on a second remote network node, an enterprise
application web server executing on a third remote network node, and a magnetic
card reader.

See, e.g., Claim 1. Applicants respectfully submit that neither the cited sections of Wakai nor
Tso nor Iwamoto, alone or in combination, provide disclosure of at least these limitations.

The present Office Action admits that the combination of Wakai with Tso fails to provide
disclosure of the claimed request being received from a plurality of source types. *See* Office
Action, p.6. The Office Action further admits that the combination of Wakai with Tso fails to
provide disclosure of the plurality of source types of the request comprising the control module
executing on a second remote network node, an enterprise application web server executing on a
third remote network node, and a magnetic card reader. *Id.* In an attempt to remedy this
deficiency of the disclosure of Wakai and Tso, the Office Action relies upon Iwamoto.
Applicants respectfully submit that the cited sections of Iwamoto fail to provide disclosure of all
the various claimed source types. Failing to provide such disclosure, the combination of Wakai,
Tso and Iwamoto then fails to disclose all the limitations of the independent claims.

The stated purpose of Iwamoto is to purportedly provide a centralized authentication
server that provides authentication services for walk-up and remote users of a device. *See, e.g.,*
Iwamoto 2:13-30. The centralized authentication server is illustrated as element 8 in Iwamoto
Figures 1 and 3. *See* Iwamoto 4:49-57, 4:27-36. Part of Iwamoto's authentication server is an
access controller 49. *See* Iwamoto Figure 3. Iwamoto states that access controller 49 determines
whether a remote user (e.g., a walk-up user of a device such as a copier/printer) has authorization
to access various device features. *See, e.g.,* Iwamoto 6:47-52. Thus, Iwamoto's authentication

server and its associated access controller are purported by Iwamoto to receive authentication requests and respond to them.

As purported disclosure of the claimed “control module” and “enterprise application web server” sources of a request, the Office Action cites to Iwamoto’s access controller 49 and authentication server 8, respectively. *See* Office Action, pp.6-7. But, as discussed above, Iwamoto makes it clear that the access controller 49 and the authentication server 8 are not sources of a request. Instead, the cited elements of Iwamoto are at best receivers of a request. Therefore, Iwamoto’s access controller cannot be correlated to the claimed “control module” and Iwamoto’s authentication server cannot be correlated to the claimed “enterprise application web server” sources because these elements are not sources of a request, as claimed.

In addition, the Office Action suggests that Iwamoto’s authentication server is an “enterprise application web server.” *See* Office Action, p.6. Applicants respectfully submit that the cited sections of Iwamoto offer no disclosure that Iwamoto’s authentication server is an “enterprise application web server,” or indeed a web server of any kind. After a review of Iwamoto, Applicants have found no suggestion that the authentication server provides any web services of any kind.

Since Iwamoto fails to provide disclosure of at least these two sources of requests, the Office Action would once again have to rely upon Wakai and Tso for such disclosure. But as discussed above, the Office Action admits that the combination of Wakai with Tso fails to provide such disclosure. Therefore, the combination of Wakai, Tso and Iwamoto likewise fails to provide disclosure of all the claimed sources, as required for a finding of obviousness.

For at least these reasons, Applicants submit that the combination of Wakai, Tso and Iwamoto fails to provide disclosure of all the limitations of independent Claims 1, 9, 16, 23 and

30, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

Dependent Claim 3:

In addition to the above discussion, Applicants further submit that the cited combination of Wakai, Tso and Iwamoto fails to provide disclosure of dependent Claim 3, which provides "the first language is a markup language." That is, the received request conforms to a format defined in a markup language.

The Office Action only cites to portions of Wakai as purported disclosure of this limitation. But this limitation relates to requests provided by the claimed sources. The Office Action admits that Wakai fails to provide disclosure of the sources and instead relies upon the disclosure of Iwamoto. Applicants respectfully submit that there is no disclosure in Iwamoto that suggests that the cited elements communicate requests defined by a markup language.

As claimed, the sources of a request provide the request in a format defined by the markup language. The Office Action suggests that Iwamoto's authentication server and the access controller are sources of the request. Even were one to assume that the cited elements of Iwamoto could function as sources of a request (a proposition with which Applicants do not agree [*see above*]), there is no disclosure in Iwamoto that either of these elements communicate using a request in a format defined by a markup language. There is no mention in Iwamoto of a markup language at all. Indeed, Iwamoto appears to teach away from the use of a markup language for requests by providing that the authentication server purportedly communicates using cryptographic secure communication. *See Iwamoto 8:56-9:5.*

For at least these reasons, and those discussed above, Applicants submit that the combination of Wakai, Tso and Iwamoto fails to provide disclosure of all the limitations of dependent Claim 3 and that this claim is in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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